1 JOHN G. JACOBS (PRO HAC VICE) BRYAN G. KOLTON (PRO HAC VICE) 2 JACOBS KOLTON, CHTD. 55 West Monroe Street, Suite 2970 3 Chicago, Illinois 60603 Telephone: (312) 427-4000 Facsimile: (312) 268-2425 5 Email: jgjacobs@jacobskolton.com bgkolton@jacobskolton.com 6 Attorneys for Plaintiff Beverly Nunes 7 DAVID H. KRAMER, State Bar No. 168452 8 WILSON SONSINI GOODRICH & ROSATI 9 **Professional Corporation** 650 Page Mill Road 10 Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 11 Facsimile: (650) 493-6811 Email: dkramer@wsgr.com 12 Attorneys for Defendant Twitter, Inc. 13 14 UNITED STATES DISTRICT COURT 15 NORTHERN DISTRICT OF CALIFORNIA 16 SAN FRANCISCO DIVISION 17 18 BEVERLY NUNES, individually and on behalf CASE NO.: 14-cv-02843-VC of a class of similarly situated individuals, 19 STIPULATION AND [PROPOSED] Plaintiff, **ORDER STAYING PROCEEDINGS** 20 AND MODIFYING CASE 21 **SCHEDULE** v. 22 TWITTER, INC., 23 Defendant. 24 25 26 27 28 STIPULATION AND [PROPOSED] ORDER REGARDING STAY AND SCHEDULE CASE No.: 14-CV-02843-VC

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1	On February 24, 2015, the parties in this matter participated in a mediation with the Hon.							
2	Read Ambler, and agreed to further discussions and a further mediation session that is currently							
3	scheduled to be conducted on March 24, 2015. In connection with their ongoing discussions, the							
4	parties have jointly agreed to request a three-month stay of proceedings in this matter, along with							
5	corresponding extensions to the existing case schedule. The parties' agreement and request for a							
6	stay is made in good faith and not for purposes of delay.							
7								
8	THE PARTIES THEREFORE STIPULATE through their undersigned counsel, subject							
9	to the Court's approval, that:							
10	1. All proceedings in this matter should be stayed through June 2, 2015;							
11	2. The existing case schedule should be modified as follows: Phase I Discovery							
12	completed by September 30, 2015; Initial Expert Witness statements shall be submitted							
13	by October 17, 2015; Rebuttal Expert Witness statements shall be submitted by Novem-							
14	ber 3, 2015; Motions for Summary Judgment on Phase 1 to be heard on February 19,							
15	2016 10:00 a.m.							
16								
17	DATE: March 3, 2015 /s/ David H. Kramer							
18	David H. Kramer							
19	WILSON SONSINI GOODRICH & ROSATI							
20	Attorney for Defendant Twitter, Inc.							
21	DATE: March 3, 2015 /s/ John G. Jacobs							
22	John G. Jacobs (<i>PRO HAC VICE</i>) JACOBS KOLTON, CHTD							
23	Jeffrey F. Keller KELLER GROVER, LLP							
24	Attorneys for Plaintiff Beverly Nunes							
25	Aubineys joi I minuji Deveny Ivanes							
26								

STIPULATION AND [PROPOSED]
ORDER REGARDING STAY AND SCHEDULE
CASE NO.: 14-CV-02843-VC

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PURSUANT TO	O STIPULATION,	AND GOOD	CAUSE A	PPEARING,	IT IS	HEREBY
ORDERED THAT:						

- 1. All proceedings in this matter are stayed through June 2, 2015;
- The existing case schedule is modified as follows: Phase I Discovery completed 2. by September 30, 2015; Initial Expert Witness statements submitted by October 17, 2015; Rebuttal Expert Witness statements submitted by November 3, 2015; Motions for Summary Judgment on Phase 1 to be heard on February 19, 2016 10:00 a.m.

SIGNED this _____ day of March, 2015.

VINCE CHHABRIA UNITED STATES DISTRICT JUDGE

STIPULATION AND [PROPOSED] CASE No.: 14-CV-02843-VC

ORDER REGARDING STAY AND SCHEDULE